

NS:OO
F. #2022R00346

FILED 5/18/2022

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

Cr. No. 1:22-cr-00234(HG)(CLP)
(T. 18, U.S.C., §§ 1959(a)(3), 2
and 3551 et seq.)

ERICK ESTRADA,
also known as "Chico,"

Defendant.

----- X

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

The Enterprise

1. The 18th Street gang ("18th Street" or the "Enterprise") was a violent street gang with members located throughout Queens, New York, and elsewhere, divided into local chapters or "canchas." Members and associates of 18th Street engaged in acts involving murder, assault, narcotics trafficking and extortion, as well as other crimes.

2. 18th Street, including its leadership, members and associates, constituted an "enterprise" as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of

achieving the objectives of the Enterprise.

3. 18th Street, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts and threats involving murder that are chargeable under New York Penal Law and punishable by imprisonment for more than one year; offenses involving narcotics trafficking, punishable under Title 21, United States Code, Sections 841 and 846; and acts indictable under Title 18, United States Code, Section 1028 (relating to fraud and related activity in connection with identification documents).

Purposes of the Enterprise

4. The purposes of the Enterprise included the following:

- (a) promoting and enhancing the prestige, reputation and position of the Enterprise with respect to rival criminal organizations;
- (b) preserving and protecting the power, territory and criminal ventures of the Enterprise through the use of intimidation, threats of violence and acts of violence, including acts involving murder and assault;
- (c) keeping victims and rivals in fear of the Enterprise and its members and associates;
- (d) enriching the members and associates of the Enterprise through criminal activity, including narcotics trafficking, production of fraudulent identification documents and other criminal activity for profit;

- (e) ensuring discipline within the Enterprise and compliance with the Enterprise's rules by members and associates through threats of violence and acts of violence; and
- (f) concealing the activities of the Enterprise from law enforcement;

Means and Methods of the Enterprise

5. Among the means and methods by which members of 18th Street and their associates conducted and participated in the conduct of the affairs of the Enterprise were the following:

- (a) Members of 18th Street and their associates committed, attempted to commit, conspired to commit and threatened to commit acts of violence, including acts involving murder and assault, to enhance the Enterprise's prestige and to protect and expand the Enterprise's criminal operations.
- (b) Members of 18th Street and their associates used and threatened to use physical violence against various individuals, including members of rival criminal organizations and 18th Street members and associates believed to have violated the Enterprise's rules.
- (c) Members of 18th Street and their associates used, attempted to use and conspired to use narcotics trafficking, production of fraudulent identification documents and extortion as means of obtaining money.

The Defendant

6. The defendant ERICK ESTRADA, also known as "Chico," was a member of 18th Street.

ASSAULT IN-AID-OF RACKETEERING

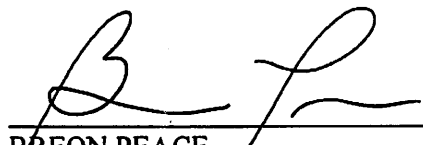
7. The allegations contained in paragraphs one through six are realleged and incorporated as if fully set forth in this paragraph.

8. On or about December 31, 2021, within the Eastern District of New York and elsewhere, the defendant ERICK ESTRADA, also known as "Chico," together with others, for the purpose of gaining entrance to, and maintaining and increasing position in, 18th Street, an enterprise engaged in racketeering activity, did knowingly and intentionally assault with a dangerous weapon John Doe, an individual whose identity is known to the Grand Jury, in violation of New York Penal Law Sections 120.05(2) and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), 2 and 3551 et seq.)

A TRUE BILL


FOREPERSON


BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2022R00346
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ERICK ESTRADA, aka "Chico."

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 1959(a)(3), 2 and 3551 et seq.)

A true bill.

Valau D. Bickling

Foreperson

Filed in open court this _____ day.

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Olatokunbo Olaniyan, Assistant U.S. Attorney (718) 254-6317